



STATE OF MICHIGAN
 DEPARTMENT OF
 ENVIRONMENT, GREAT LAKES, AND ENERGY
 KALAMAZOO DISTRICT OFFICE



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

October 14, 2019

Mr. Greg Schafer
 Sherwin-Williams Company
 636 East 40th Street
 Holland, Michigan 49423

SRN: B7711, Allegan County

Dear Mr. Schafer:

VIOLATION NOTICE

On July 24, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Sherwin-Williams Company located at 636 East 40th Street, Holland, Michigan. The purpose of this inspection was to determine Sherwin-Williams Company compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and

-- the conditions of Renewable Operating Permit (ROP) number MI-ROP-B7711-2016;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Acetone Cleaning Stations	Rule 201 and Rule 707(3)(a)(i)	Staff observed that the facility did have one parts washer during the inspection. After the inspection staff was told that facility has 6 cold cleaning stations with 3 of them ventilating outside. Staff was told that the facility typically fills these units with acetone and will occasionally use hexane. Acetone is considered and exempt VOC and therefore would not meet the definition of a cold cleaner. The facility using Hexane would meet the cold cleaner definition.

		After review of the SDS provided for Hexane the vapor pressure was 17.7 hPa for Hexane his converts to roughly 2.57 psi. Part 7 rules require specifically Rule 707(3)(a)(i) requires that solvents that have a Reid Vapor pressure greater than 0.3 psia shall use a cover that is mechanically assisted. During the inspection the cold cleaner that was observed did not have a mechanically assisted cover. The facility would be in violation of the Part 7 rules when Hexane is used. The facility should be keeping acetone usage records for the units that ventilate outside as it appears that Rule 290 is the only exemption that would be applicable.
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During this inspection, it was noted that Sherwin-Williams Company had commenced operation of unpermitted equipment at this facility. The AQD staff advised Sherwin-Williams Company on July 24, 2019, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the acetone cleaning stations process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 4, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the

Mr. Greg Schafer
Sherwin-Williams Company
Page 3
October 14, 2019

dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Sherwin-Williams Company believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Sherwin-Williams Company. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Cody Yazzie
Environmental Engineer
Air Quality Division
269-567-3554

Enclosure

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE